

**ROYAL BOROUGH OF WINDSOR & MAIDENHEAD
PLANNING COMMITTEE**

DEVELOPMENT CONTROL PANEL

7 September 2022

Item: 1

Application No.:	22/00217/FULL
Location:	Land At 57 To 61 The Green Wraysbury And 1 To 3 Station Road Wraysbury Staines
Proposal:	Proposed change of use of ground floor of No.57 from takeaway to office. External alterations to 59 The Green and change of use from car repairs to 2 x offices (ground floor) and 1no. one bed flat (first floor). Two storey rear extension to 61 The Green and conversion of 3 bed dwelling to 1no. one bed and 1no. two bedroom flats. Alterations and extensions to 1-3 Station Road and change of use from part ground floor retail and part domestic to form 4no. one bed, 1no. two bed and 1no. three bed flats. Erection of 2no. semi-detached houses (1no. two bed and 1no. three bed) to rear of nos. 5-7 Station Road.
Applicant:	Mr & Mrs Gamester
Agent:	Mr Neil Davis
Parish/Ward:	Wraysbury Parish/Datchet Horton And Wraysbury

If you have a question about this report, please contact: Jeffrey Ng on or at jeffrey.ng@rbwm.gov.uk

1. SUMMARY

- 1.1. This application is seeking to redevelop No. 57, No. 59 & No. 61 The Green, 1-3 Station Road and rear of 5-7 Station Road to provide a mixed office-residential scheme. The proposed development comprises 12 residential units and 3 office units.
- 1.2. The proposed development is considered to be unacceptable for a number of reasons including 1) the layout of the proposed development is poorly designed. The resultant amount of hard-surfacing and built form would dominate the site leaving limited space for meaningful landscaping. The proposed 2 semi-detached houses in Plot 11 and 12 which are located at a poor location and appear at odds and not to be in line with the wider character of the area and the increase in height and mass of 1-3 The Green would not respect the form and scale of the neighbouring buildings and be prominent within the street scene, furthermore, the, 2) adverse impact on amenity on neighbouring properties and future occupants, 3) the proposed development would be harmful to the special interest of the adjacent listed building, 4) failure to provide an appropriate housing mix in the proposed development, 5) lack of onsite affordable housing provision or contribution towards affordable housing, 6) failure to provide an acceptable flood risk assessment and to pass the sequential test and exceptions test, 7) failure to provide a bat survey as required and 8) failure to meet the requirements of SP2 and the Council's interim sustainability statement.
- 1.3. Weighing in favour of the scheme, the proposed development would provide 12 residential units (a net increase of 8) and 3 new office units to the site. However, the weight attributed to these benefits would not either individually or cumulatively, be sufficient to outweigh the other harms that are set out above. On this basis of the foregoing, it is therefore recommended that planning permission be refused.

It is recommended the Committee refuses planning permission for the following summarised reasons (the full reasons are identified in Section 15 of this report):

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| 1. | The layout of the proposed development is poorly designed. The quantum of built form and hard surfacing within the site would leave very limited space for meaningful landscaping which is at odds with the character of the area. While the site is immediately next to the riverside meadows, only very limited space along the riverside is retained. Furthermore, the proposed 2 semi-detached houses in |
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	<p>Plot 11 and 12 which are located at a poor location and appear at odds and not to be in line with the wider character of the area. The proposed roof extension to 1-3 The Green, by virtue of its height, bulk and design, also would not respect the scale and form of the neighbouring buildings and would appear prominent in the street scene. The proposed development is contrary to Section 12 of the NPPF, Policy QP3 of the Borough Local Plan 2013-2033, Policies NP/HOU1 and NP/HOU2 of the Horton and Wraysbury Neighbourhood Plan 2018-2033.</p>
2.	<p>The proposed development fails to provide a good quality outlook of the external environment from habitable rooms and would result in overlooking the neighbouring properties. There is also insufficient amenity space for future occupants of the proposed development. As such, the proposed development fails to provide a good standard of accommodation for future occupiers and is contrary to Policy QP3 of the Borough Local Plan 2013-2033 and the Borough Wide Design Guide.</p>
3.	<p>The proposed development comprises an increased height of the corner building, 1-3 The Green, which is immediately opposite the Grade II listed The Perseverance Public House. No heritage statement is provided to assess the impacts on the setting of the Grade II listed building. The increase in the height of the building would be harmful to the setting of the listed building and would represent less than substantial harm to the significance of the designated heritage asset. Given that no public benefit has been identified in the application that would outweigh this harm, the proposal is considered to be contrary to Sections 12 and 16 of the NPPF and Policies QP3 and HE1 of the Borough Local Plan 2013-2033.</p>
4.	<p>The proposed development includes the provision of twelve residential units, of which the majority of the units would be one-bedroom. The proposed housing size mix of this proposed development is not in accordance with the Strategic Housing Market Assessment 2016 suggested housing size mix. In an absence of other evidence of local circumstances or market conditions, it is not considered that the proposed housing mix of the proposal is acceptable as it would fail to provide an appropriate mix of dwelling types and sizes to meet the needs of current and projected households of the local area. The proposal is contrary to Policy HO2 of the Borough Local Plan 2013-2033.</p>
5.	<p>The proposed development includes the provision of twelve residential units (gross), which would trigger the affordable housing requirement within the development plan. The proposed development is not seeking to provide any on-site affordable housing or provide a contribution towards affordable housing. No information or viability evidence has been provided in this application. The proposed development, therefore, fails to comply with Policy HO3 of the Borough Local Plan 2013-2033.</p>
6.	<p>The proposed development is within Flood Zone 2 and 3. In an absence of an acceptable flood risk assessment, the proposed development fails to assess the flood risk to future occupiers and elsewhere. The proposal development also fails to pass the sequential test. Therefore, the proposed development fails to comply with Section 14 of the National Planning Policy Framework and Policy NR1 of the Borough Local Plan 2013-2033.</p>
7.	<p>The outcome of the bat survey is a material consideration for the proposal. As the current application does not comprise the bat survey as a recommendation by the submitted preliminary roost assessment report, there is insufficient information to demonstrate that the proposal would not have an adverse ecological impact on the natural habitats. The proposal, therefore, fails to comply with Section 15 of the National Planning Policy Framework and Policy NR2 of the Borough Local Plan (2013-2033).</p>

8.	The applicant has failed to submit information to demonstrate how the proposed development would work towards minimising CO2 emissions or how it has been designed to incorporate measures to adapt to and mitigate climate change. As such, the proposal is considered to be contrary to Policy SP2 of the Borough Local Plan, Chapter 14 of the NPPF (2021) and the Council's Interim Sustainability Position Statement.
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2. REASON FOR COMMITTEE DETERMINATION

- 2.1. The Council's Constitution does not give the Head of Planning delegated powers to determine the application in the way recommended; such decisions can only be made by the Committee
- 2.2. Furthermore, this application was called in by Cllr Muir only if the recommendation of the Head of Planning is to grant the application as the application is overdevelopment and is within floodplain.

3. THE SITE AND ITS SURROUNDINGS

- 3.1. The application site is located at the junction between Station Road and the Green. The site contains a number of plots, and the following table summarises the existing uses:

Address	Existing Use
57 The Green	Takeaway (sui generis) on the ground floor and a 1x studio flat above
59 The Green	Car repairs garage (class B2) on the ground floor and an ancillary office above
61 The Green	1 x Three-bedroom two-storey house
1 - 3 Station Road	2 x ground floor Retail units and 1 x two-bedroom flat, 1 x 2-bed house

- 3.2. The majority of the application site falls within Wraysbury Local Centre (except No.3 Station Road, and land rear of 5 to 7 Station Road). The site falls within Environment Agency Flood Zone 2 and 3. The site is also within the 5F Wraysbury Victorian Village Character Area as identified in the Townscape Character Assessment. The Perseverance public house, which is a Grade II listed building, is on the opposite side of the junction with the Green.

4. KEY CONSTRAINTS

- Environment Agency Flood Zone 2 and 3
- Wraysbury Local Centre

5. THE PROPOSAL

- 5.1. This application comprises a number of plots including No. 57, No. 59 & No. 61 The Green, 1-3 Station Road and 5-7 Station Road. The following table summarises the proposed development:

Address	Proposal
57 The Green	Change of use of ground floor from takeaway (sui generis) to office (Class E). Existing studio flat to remain (plot 1)
59 The Green	External alterations and change of use from car repairs (Class B2) to 2x offices (ground floor) (Class E) and 1x1-bed flat (first floor) (plot 2)
61 The Green	Two-storey rear extension and conversion of an existing 3-bedroom dwelling to provide 1 x 1-bed flat and 1 x 2-bed flats (plots 3 and 4)
1-3 Station Road	Alterations and extensions and change of use from part ground floor retail (Class E) and part domestic unit to form 4 x 1-bed flats, 1x 2-bed flat and 1x 3-bed flat. (Plots 5-10)
Rear of 5-7 Station	Erection of 2 semi-detached houses (1x 2-bed and 1x3-bed) at

Road	the rear of the plot (plots 11 and 12)
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5.2 In terms of proposed residential units, the proposal would include the retention of 1 x studio flat, and conversion of the other existing buildings into 9 units, with the erection of 2 new detached dwellings. As such there would be a net increase in 8 units (12 gross), with only the existing 1-bed studio flat remaining unaltered.

6. RELEVANT PLANNING HISTORY

6.1. There are a number of planning applications for individual sites but there is no recent case history with regard to the wider site. The most recent case was the withdrawn change of use application (19/01288/FULL) for the ground floor from retail (A1) to residential (C3), the creation of two residential units at 1 Station Road, Wraysbury. This was withdrawn as no flood risk assessment was provided to support the application and it would have been recommended for refusal.

7. DEVELOPMENT PLAN

7.1. The main relevant policies are:

Adopted Borough Local Plan 2013-2033

Issue	Policy
Spatial Strategy for the Borough	SP1
Climate Change	SP2
Sustainability and Placemaking	QP1
Character and Design of New Development	QP3
Housing Development Sites	HO1
Housing Mix and Type	HO2
Affordable Housing	HO3
Hierarchy of Centres	TR1
Local Centres	TR5
Historic Environment	HE1
Managing Flood Risk and Waterways	NR1
Nature Conservation and Biodiversity	NR2
Infrastructure and Developer Contributions	IF1
Sustainable Transport	IF2

Adopted Horton and Wraysbury Neighbourhood Plan 2018-2033

Issue	Policy
The presumption in favour of sustainable development	NP/SUSTDEV01
Management of the Water Environment	NP/SUSTDEV02
Good Quality Design	NP/HOU1
Footprint, Separation, Scale & Bulk	NP/HOU2
Smaller Properties & Housing Mix	NP/HOU3
Redevelopment & Change of Use	NP/HOU4

Water Supply, Waste Water, Surface Water and Sewerage Infrastructure	NP/HOU5
Heritage Assets	NP/BE2
Landscape	NP/OE1
Ecology	NP/OE2

8. MATERIAL PLANNING CONSIDERATIONS

National Planning Policy Framework Sections (NPPF) (2021)

Section 2 – Achieving sustainable development
Section 4- Decision-making
Section 5 – Delivering a sufficient supply of homes
Section 6 – Building a strong, competitive economy
Section 7 – Ensuring the vitality of town centres
Section 9- Promoting Sustainable Transport
Section 11 – Making effective use of land
Section 12- Achieving well-designed places
Section 14- Meeting the challenge of climate change, flooding and coastal change
Section 15 – Conserving and enhancing the natural environment
Section 16- Conserving and enhancing the historic environment

Supplementary Planning Documents

- Borough Wide Design Guide

Other Local Strategies or Publications

Other Strategies or publications material for the proposal are:

- Berkshire Strategic Housing Market Assessment (SHMA) 2016
- RBWM Townscape Assessment
- RBWM Landscape Assessment
- RBWM Parking Strategy
- RBWM Affordable Housing Planning Guidance
- Interim Sustainability Position Statement
- Corporate Strategy
- Environment and Climate Strategy
- RBWM Waste Management Planning Advice Note
 - DLUHC Technical housing standards – nationally described space standard 2015

9. CONSULTATIONS CARRIED OUT

Comments from interested parties

23 occupiers were notified directly of the application and 38 letters were received in total.

7 letters were received objecting to the application, summarised as:

Comment	Where in the report this is considered
1 Concerns over the provision of insufficient parking spaces	Section 10. ix of this Report
2 Concerns over the proposed 2 semi-detached houses would have an overlooking issue to neighbouring properties	Section 10. vii of this Report
3 The proposed 2 semi-detached houses are out of	Section 10. vi of this

	character with neighbouring properties	Report
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Consultees

Consultees	Comments	Where in the report this is considered
RBWM Highways	No highways concerns are raised subject to conditions related to cycle parking provision and the provision of electric vehicle charging facilities.	Section 10. ix of this Report
RBWM Conservation	Objection to the proposed development. A heritage statement is required as insufficient information has been provided to assess the impacts of the proposals on the setting of the Grade II The Perseverance Public House. The proposal is not considered to be sympathetic to the character of the wider area.	Section 10. viii of this Report
RBWM Environmental Protection	No objection to the proposed development subject to conditions related to contaminated land, site-specific construction environmental management plan (CEMP) and aircraft noise.	Section 10. xii of this Report
The Environment Agency	Objection to the proposed development as the submitted flood risk assessment fails to comply with the requirements for the site-specific flood risk assessments.	Section 10. v of this Report
RBWM Ecology	No comments were received by the time of writing this Report.	--
Lead Local Flood Authority (LLFA)	No comments were received by the time of writing this Report.	--

Others (e.g. Parish and Amenity Groups)

Groups	Comments	Where in the report this is considered
Wraysbury Parish Council	No objection subject to compliance with local (planning) policies	Noted.

10. EXPLANATION OF RECOMMENDATION

10.1. The key issues for consideration are:

- i) Principle of Development
- ii) Climate Change and Sustainability
- iii) Housing Size and Mix
- iv) Affordable Housing
- v) Flood Risk

- vi) Design and Character
- vii) Impact on Neighbouring Amenity / Future Occupants
- viii) Heritage and Conservation
- ix) Highway and Parking
- x) Waste Management
- xi) Ecology and Biodiversity
- xii) Environmental Health
- xiii) Other Material Considerations

i) Principle of Development

- 10.2. Policy ED1 of the Borough Local Plan 2013-2033 sets out that new office spaces within the Borough will be focused on Maidenhead, Windsor and Ascot town centres. Supporting text 9.12.1 does set out that the role of local centres is to include a range of small shops serving a localised catchment. The proposal is seeking to introduce 3 new office units to the site, including a change of use of the ground floor from takeaway to office (No. 57 The Green) and a change of use of the ground floor from car repair garage to two office units (No. 59 The Green). Though the provision of new office floorspace would help retain employment following the loss of retail units, the proposed office units are not preferable to the retail units or other services in terms of supporting customer choice and would only be considered an appropriate local centre use if the loss of the retail units could be justified. The proposal is also seeking to convert the 2 ground floor retail units into 2 residential units (No. 1-3 Station Road).
- 10.3. Policy TR5 (1) of the Borough Local Plan 2013-2033 sets out that non-retail uses and services will only be supported provided the overall function of the centre and opportunities for customer choice are maintained. Policy TR5 (4) sets out that residential or other uses on the ground floor will only be considered if there is a considerable proportion of vacant property in a centre and the proposed uses will not adversely affect the function of the centre within the retail hierarchy. Policy NP/BUSEC1 of the Horton and Wraysbury Neighbourhood Plan 2018-2033 sets out that marketing evidence for a 12-month period is required if the existing retail unit is no longer viable.
- 10.4. In this case, the proposal would lead to a loss of 2 retail units, a car repairs and a takeaway in Wraysbury Local Centre. Though no marketing evidence has been provided as required in Policy NP/BUSEC1, it is considered that the retail units including the car repairs garage have been vacant already for a certain period of time, based on the planning history of the site and officers' site visit. Furthermore, it is considered that there are significant other local services within the local centre, such that the overall function of the centre and opportunities for customer choice would be sufficiently maintained to meet the requirements of policy TR5. There is also no evidence showing that Wraysbury Local Centre has a considerable proportion of vacant property. Therefore, it is not considered that the proposed development will adversely affect the function of Wraysbury Local Centre in this case.

Fallback Position

- 10.5. Additionally, according to the current use classes order, which was updated on 1 September 2020, Class E now covers uses previously defined in the revoked Classes A1/2/3 and also B1. It is considered to be a realistic fallback position that the existing retail units could be converted into offices without express planning permission.

Summary

- 10.6. The proposal would lead to a loss of 2 retail units, a takeaway and a local car repair garage. Though the proposed office use is not the preferred use in terms of supporting customer choice, the planning history and the outcome from officers' site visit show that the existing retail units have already been vacant for a certain period of time and there is a significant number of other shops and services within the wider centre such that the proposal would not adversely affect the function of Wraysbury Local Centre. The proposal is therefore considered to be in accordance with the aims of policy TR5.

ii) Climate Change and Sustainability

- 10.7. The Climate Change Act 2008 (CCA2008) imposes a duty to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline. Paragraph 152 of the NPPF states that the planning system should support the transition to a low carbon future in a changing climate by contributing to a radical reduction in greenhouse gas emissions, minimising vulnerability and improving resistance, and supporting renewable and low carbon energy and associated infrastructure. The Royal Borough of Windsor and Maidenhead declared a climate emergency in June 2019, and the Council intends to implement a national policy to ensure net-zero carbon emissions can be achieved by no later than 2050.
- 10.8. In December 2020, the Environment and Climate Strategy were adopted to set out how the Borough will address the climate emergency. These are material considerations in determining this application. The strategy sets a trajectory which seeks a 50% reduction in emissions by 2025.
- 10.9. While a Sustainability Supplementary Planning Document will be produced, the changes to national and local climate policy are material considerations that should be considered in the handling of planning applications and the achievement of the trajectory in the Environment and Climate Strategy will require a swift response. The Council has adopted an Interim Sustainability Position Statement (ISPS) to clarify the Council's approach to these matters.
- 10.10. Policy SP2 of the Borough Local Plan 2013-2033 requires all development to demonstrate how they have been designed to incorporate measures to adapt to and mitigate climate change. No information including an energy statement, however, has been provided in this application. The proposed development, therefore, fails to comply with Policy SP2 of the Borough Local Plan 2013-2033 and the Interim Sustainability Position Statement.

iii) Housing Size and Mix

- 10.11. Policy HO2 of the Borough Local Plan 2013-2033 sets out that the provision of new homes should contribute to meeting the needs of current and projected households by having regard to several principles, including providing an appropriate mix of dwelling types and sizes as set out in the Berkshire Strategic Housing Market Assessment (SHMA) 2016 unless there is evidence showing an alternative housing mix would be more appropriate. Supporting text 7.5.3 sets out that the SHMA 2016 identified a need for a focus on 2 and 3-bedroom properties in the market housing sector. Policy NP/HO3 of the Horton and Wraysbury Neighbourhood Plan 2018-2033 sets out that all housing proposals of five or more units should deliver at least 20% of these units as one- or two-bed properties.
- 10.12. The proposal is seeking to provide 7x 1-bedroom units (58%), 3x 2-bedroom units (25%) and 2x 3-bedroom units (17%). The proposed housing size mix of this proposed development is not in accordance with the SHMA suggested housing size mix. The majority of the units would be 1-bedroom. In an absence of other evidence of local circumstances or market conditions, it is not considered that the proposed housing mix of the proposal is acceptable as it would fail to provide an appropriate mix of dwelling types and sizes to meet the needs of current and projected households of the local area. The proposal is contrary to Policy HO2 of the Borough Local Plan 2013-2033.

iv) Affordable Housing

- 10.13. Policy HO3 of the Borough Local Plan 2013-2033 sets out that all developments for 10 dwellings gross, or more than 1,000 square metres of residential floorspace are required to provide on-site affordable housing by the following:
- On greenfield sites providing up to 500 dwellings gross – 40% of the total number of units proposed on the site.
 - On all other sites, (including those over 500 dwellings) – 30% of the total number of units.

- 10.14. The proposed development is for 12 dwellings (gross), 11 of which would be newly formed units, which would trigger the affordable housing requirement within the development plan. The proposed development is not seeking to provide any on-site affordable housing or provide a contribution towards affordable housing. No information or viability evidence has been provided in this application.
- 10.15. In the Royal Borough, the need for the provision of affordable housing is acute. In the absence of a planning obligation to secure a provision or a contribution towards affordable housing provision in the local area, the proposed development is in conflict with the requirement of Policy HO3 which sets out the requirements for affordable housing provision.
- 10.16. The Royal Borough is able to demonstrate an up-to-date supply of land for housing and is therefore not reliant on sites that are not policy compliant to bring forward adequate housing in the Borough. The proposed development is not considered to secure sufficient public benefit development to outweigh these material concerns with the under-provision of affordable housing on the site and the lack of compliance with the policy identified above. The proposed development, therefore, fails to comply with Policy HO3 of the Borough Local Plan 2013-2033.

v) Flood Risk

- 10.17. Policy NR1 of the Borough Local Plan 2013-2033 sets out that development will only be supported within designated Flood Zones 2 and 3, where an appropriate flood risk assessment has been carried out and it has been demonstrated that development is located and designed to ensure that flood risk from all sources of flooding is acceptable in planning terms. Development proposals should include an assessment of the impact of climate change using appropriate climate change allowances over the lifetime of the development so that future flood risk is taken into account.
- 10.18. Policy NP/SUSTDEV02 of the Horton and Wraybury Neighbourhood Plan 2018-2033 sets out that development proposals for residential or non-residential development within the areas shown within Flood Zones 2 and 3 as shown on the Environment Agency's Flood Maps will not be supported apart from the one for one replacement of houses and extensions to existing houses up to the limit allowable under the permitted development rights granted by Parts A and E of Schedule 2 of the Town and Country Planning (General Permitted Development Order) 2015 or such secondary legislation that replaces it. The design and construction of new buildings should have regard to national flood resilience guidance and other relevant policies in the development plan. Additionally, action should be taken where appropriate to improve and reduce the overall flood risk.
- 10.19. The application site is located within Flood Zone 2 and 3, which means that the site has a medium to high probability of flooding and will need a flood risk assessment. This application is accompanied by a flood risk assessment, a sequential test and exceptions test report and a floodplain storage report, which are prepared by GeoSmart Information Ltd on behalf of the applicant.
- 10.20. The Environment Agency has been consulted in this application and raised objections to the application in the absence of an acceptable flood risk assessment (FRA). For all developments, there is a need to ensure that flood risk would not be increased elsewhere either through a loss of floodplain storage capacity or impeding the flow of flood water. In this case, the temporary storage of materials is used in calculating the existing footprint. It is considered that only permanent structures should be used in calculating the existing footprint so the impact on the floodplain storage should be reassessed. Furthermore, clarification is required from the applicant to confirm if there will be any ground level raising as part of the access track, car parking or landscaping and if there will be no new development or ground level raising in Flood Zone 3b by overlaying topographical survey onto the site plan.

The Sequential Test

- 10.21. National Planning Policy Framework (NPPF) sets out that the proposed residential development is classified as a “More Vulnerable” use and the sequential test is required as it is within Flood Zone 3. Paragraph 162 of the NPPF sets out that the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Policy NR1 of the Borough Local Plan 2013-2033 also sets out that the sequential test is required for all development in areas at risk of flooding, except for proposed developments on sites allocated in the Borough Local Plan or in a made Neighbourhood Plan.
- 10.22. A sequential test has been provided to support this application. The Sequential test or exceptions test is not required for the ground floor office use as this is categorised as a less vulnerable development within flood zone 3.
- 10.23. Though the geographical search area of the test is Borough-wide, the submitted sequential test is also only passed on a reduced site search area basis. The test, however, should cover all reasonably available sites, which include any sites that are suitable, developable and deliverable and it is not limited to sites within the Housing and Economic Land Availability Assessment (HELLA) only.
- 10.24. Furthermore, there are queries regarding the dismissal of several of the assessed sites. According to the submitted table (Table 1: Appendix E: Allocation Sites) of the sequential test report, it identifies that 25-27 Braywick Road site is not suitable as the proposed yield is less than the application site. However, it is not clear what is the meaning of “the proposed yield is less than the application site”. Furthermore, Berkshire House, High Street site is stated to be not suitable as planning permission was granted. It is considered that sites would only be considered unsuitable if both planning permissions have been granted and conditions discharged. Therefore, further clarification is required in this regard.
- 10.25. The submitted sequential test fails to sufficiently cover all reasonably available sites, which include any sites that are suitable, developable and deliverable within the Borough. Therefore, it is considered that the proposed development fails to pass the sequential test in this case. The proposed development fails to comply with Section 14 of the NPPF and Policy NR1 of the Borough Local Plan 2013-2033.

The Exceptions Test

- 10.26. Upon failure to pass the sequential test, there is no need to go on assessing the exceptions test. Notwithstanding, and for completeness, the submitted FRA sets out that the finished floor level (FFL) can be set at 18.08 mAOD2. A map showing new residential development above the FFL is required to support this application. The submitted FRA sets out that a safe and egress route is identified but no further details regarding the route are provided in this application, such as a map showing the access and egress route.

Surface Water Flooding

- 10.27. This application is accompanied by a surface drainage assessment, which is prepared by GeoSmart Information Ltd on behalf of the applicant. The report summarises that the drainage system has the capacity to accommodate the 1 in 100 year event before flooding occurs. The Lead Local Flood Authority (LLFA) has been consulted in this application but no comments have been received by the time of writing this report. It is considered that details of the surface drainage should be secured by a planning condition.

Summary

- 10.28. The application site is located within Flood Zone 2 and 3. However, an acceptable flood risk assessment has not been provided to support this application. The application also fails to pass the sequential test. Therefore, the proposed development fails to comply with Section 14 of the National Planning Policy Framework and Policy NR1 of the Borough Local Plan 2013-2033.

vi) Design and Character

- 10.29. The appearance of the development is a material planning consideration. Section 12 of the NPPF and Policy QP3 of the Borough Local Plan 2013-2033 sets out that all development should seek to achieve a high-quality design that improves the character and quality of an area.
- 10.30. Policy NP/HOU1 of the Horton and Wraysbury Neighbourhood Plan 2018-2033 also sets out that development proposals should make a positive contribution to the character and sense of place of Horton and Wraysbury's built environment and landscape, thereby responding to the local distinctiveness of the Plan area through its excellence of design, the appropriateness of its height, layout, scale, massing and through the use of good quality locally appropriate materials. Policy NP/HOU2 also sets out that new development should respect the footprint, separation, scale, bulk and height of the buildings in the surrounding area generally and neighbouring properties.

Layout and Scale

- 10.31. The application site is within Wraysbury High Street Area and the 5F Wraysbury Victorian Village Character Area as identified in the Townscape Character Assessment. The Assessment identifies that the main village street has active building frontage. The application site is very sensitive as it is a corner plot, and it is immediately opposite the Grade II listed The Perseverance Public House.

Additional Floor to No. 1-3 Station Road (Plots 5 to 10)

- 10.32. The proposal is seeking to add an additional storey to No. 1-3 Station Road, which is at the corner of the site and it is immediately opposite the Grade II listed The Perseverance Public House. The increase in height of this building, coupled with the design and bulk of the roof extension would substantially add to the bulk and massing of the building. This building adjoins two existing two-storey buildings with traditional pitched roofs either side and it is considered that the height, mass and design of this proposed roof form would appear at odds with the existing neighbouring buildings. This part of the development would fail to respect the village character of the area and appear prominent in the locality.

New Builds (Plot 11 and 12)

- 10.33. Concerns have been raised during the public consultation that the proposed 2 semi-detached houses are out of character with neighbouring properties. While the proposed dwellinghouses in Plots 11 and 12 will be of a traditional design and the proposal is attempting to follow the existing building line of the adjacent neighbouring property, the dwellinghouses are located immediately adjacent to the hardstanding parking area and are located to the rear of the existing residential properties which are outside the site boundary with a long pedestrian access from the frontage. The two proposed semi-detached houses appear at odds and not to be in line with the wider character of the area.

Landscaping

- 10.34. Policy NP/OE1 of the Horton and Wraysbury Neighbourhood Plan 2018-2033 sets out that development should conserve and enhance the quality and character of the landscape. New developments will be expected to improve the visual appearance of the land by enhancing the landscape features and the open nature of the riverside meadows.
- 10.35. The submitted planning statement sets out that the existing landscaping features will be retained and there is sufficient space for additional planting to be provided. However, the majority of the site would be dominated by buildings and hardstanding. While the site is immediately next to the riverside meadows, only very limited space along the riverside is retained. The Council Borough Wide Design Guide sets out that soft landscaping should be provided to intersperse every 3 bays if car parking courts will have more than 5 parking bays. It is considered that there is inadequate soft landscaping within the parking area and site as a whole.

Summary

10.36. In summary, the layout of the proposed development is poorly designed. The quantum of built form and hard-surfacing within the would leave very limited space for meaningful landscaping which is at odds with the character of the area. While the site is immediately next to the riverside meadows, only very limited space along the riverside is retained. Furthermore, the proposed 2 semi-detached houses in Plot 11 and 12 which are located at a poor location and appear at odd and not to be in line with the wider character of the area. The proposed roof extension to 1-3 The Green, by virtue of its height, bulk and design, would not respect the scale and form of the neighbouring buildings and would appear prominent in the street scene. Furthermore, the. The proposed development is contrary to Section 12 of the NPPF, Policy QP3 of the Borough Local Plan 2013-2033, Policies NP/HOU1 and NP/HOU2 of the Horton and Wraysbury Neighbourhood Plan 2018-2033.

vii) Impact on Neighbouring Amenity / Future Occupants

10.37. Policy QP3 of the Borough Local Plan sets out that new development should have no unacceptable effect on the amenities enjoyed by the occupants of adjoining properties in terms of privacy, light, disturbance, vibration, pollution, dust, smell and access to sunlight and daylight.

Impact on Neighbouring Amenity

10.38. Concerns have been raised during the public consultation that the proposed 2 semi-detached houses (plots 11 and 12) would result in overlooking to neighbouring properties. It is considered that the concern refers to Plot 12 only. Based on the submitted floorplan, one side window is proposed on the first floor in plot 12. Given that it is within the family bathroom, the window would be obscurely glazed. Two side windows are proposed on the ground floor in the kitchen/dining room. Given that the finished floor level of the proposed development would be not less than 18.08 mAOD2 and the separation distance between the flank wall to boundary would be less than 2 metres, the proposal would result in overlooking the neighbouring property, No. 9 Station Road and it is contrary to Policy QP3 of the Borough Local Plan 2013-2033.

Impact on Future Occupants

10.39. All new units would comply with the Nationally Described Space Standards as required by the Borough Wide Design Guide SPD.

10.40. The Council's Borough-Wide Design Guide sets out that all habitable rooms in new residential development should maintain at least one main window with an adequate outlook to external spaces. The outlook of the windows should be attractive and not dominated by visually intrusive man-made features such as parked cars. Windows should also be sensitively designed to avoid overlooking.

10.41. Based on the submitted plans, it is not considered that windows are sensitively designed in the proposed development. In No. 59 The Green (Plot 2), there is no main window in the kitchen/dining area, apart from a Velux window. The window in the bedroom will also directly face the parking area to the rear. In No. 61 The Green (Plot 3&4), the only window in the bedroom on the ground floor flat will be dominated by the side wall of bedroom 1 of the No.1 Station Road ground floor unit. In No. 1-3 Station Road (Plot 5-10), the only window in the bedroom on the ground floor flat would directly face the parking area to the rear.

10.42. The Council's Borough Wide Design Guide sets out that the provision of high-quality outdoor amenity space on flatted developments is very important. Flatted developments will be expected to provide high-quality private and communal outdoor amenity space. All flats above the ground floor should be provided with balconies unless there are conservation, privacy or heritage issues.

10.43. While private amenity spaces have been provided for plots 11 and 12, the current scheme does not comprise any high-quality public amenity space and no private amenity spaces for any of the flatted development. The proposed development fails to provide sufficient levels of high-quality private and public amenity spaces for future occupants. The proposed development therefore fails to comply with Policy QP3 of the Borough Local Plan 2013-2033.

viii) Heritage and Conservation

10.44. The Conservation Officer has been consulted in this application and concerns have been raised that the proposal is not considered to be sympathetic to the immediate vicinity and that it would fail to preserve the character of the area. There is also insufficient information provided to assess the impacts of the proposal in this application.

10.45. Paragraph 199 of the NPPF sets out that great weight should be given to the asset's conservation when considering the impact of a proposed development on the significance of a designated heritage asset. Paragraph 200 continues to set out that any harm to, or loss of, the significance of a designated heritage asset from development within its setting), should require clear and convincing justification. The Townscape Character Assessment also sets out that new development should preserve the setting of the listed building, including the Perseverance Public House.

10.46. In this case, the proposal would result in an increased height of the corner building, which is immediately opposite the Grade II listed The Perseverance Public House. A heritage statement would be required to assess the impacts on the setting of the Grade II listed building but this has not been submitted. The increase in the height and bulk of the building would be prominent in the street scene and given the close proximity of the development to this listed building, would be harmful to its setting. This represents less than substantial harm to the significance of the designated heritage asset. It is not considered that the public benefits associated with the proposal would outweigh this harm, therefore, the proposal is considered to be contrary to Sections 12 and 16 of the NPPF and Policies QP3 and HE1 of the Borough Local Plan 2013-2033.

ix) Highways and Parking

10.47. Policy IF2 of the Borough Local Plan 2013-2033 sets out that new developments should provide vehicle and cycle parking in accordance with the parking standards in the 2004 Parking Strategy (prior to the adoption of the Parking SPD). Consideration will be given to the accessibility of the site and any potential impacts associated with overspill parking in the local area.

10.48. According to the Parking Strategy, the site falls within an area of poor accessibility. The following table summarises the maximum parking standard for residential units and business (office) set out in the 2004 Parking Strategy:

Development	Maximum Parking Standard (Areas of Poor Accessibility)
1-bedroom units	1 space per unit
2- & 3-bedroom units	2 spaces per unit
Business (Office)	1 space per 35 sqm

10.49. Concerns have been raised during the public consultation regarding whether there are adequate parking spaces in this application. 20 parking spaces including 3 spaces for office users and 17 spaces for residents should be provided as the maximum parking standard set out in the Parking Strategy. The proposed development is seeking to introduce 20 parking spaces including a visitor parking space and 2 spaces for office users to the site. The Highways Authority has been consulted in this application and has raised no objection to the proposed parking arrangement. Though there is a shortfall of 1 parking space for office users, there is no requirement for the provision of visitor parking space and the overall parking space provision is in line with the maximum parking standard as required. The car parking provision is considered to be acceptable in this case.

- 10.50. The Council's Interim Sustainability Position Statement sets out that at least 20% of parking spaces should be provided with active electric vehicle charging facilities and 80% of parking spaces should be provided with passive provision. Given that 20 parking spaces will be provided, 4 active electric vehicle charging facilities are required. Based on the submitted layout, 7 electric vehicle charging facilities will be provided. Further details shall be provided to demonstrate that a minimum of 80% passive outlets shall be provided. However, such details can be secured by a planning condition if planning permission were to be forthcoming.
- 10.51. The 2004 Parking Strategy does not have a specific requirement for residential or retail parking standards for cycles. Paragraph 9.7.3 of the Strategy sets out that with certain forms of residential development, cycle parking provision may be required. The proposed development is providing 10 secure and covered cycle parking spaces for flatted residents and providing 2 secure and covered cycling parking spaces for each proposed dwellinghouse. Highways Authority has made a comment that the entrance door of the cycle store should be placed on the short edge of the proposed units. Therefore, further details shall be provided but it is considered that such details can be secured by a planning condition if planning permission were to be forthcoming.

Summary

- 10.52. The parking arrangement for residential development is considered to be acceptable. Further details related to cycle parking, and electric charging vehicle facilities are required, it is considered that such details can be secured by planning conditions if planning permission were to be forthcoming.
- 10.53. Paragraph 111 of the NPPF sets out that development should only be prevented or refused on highway grounds. Given the scale of the development, it is unlikely that the proposed development would have an adverse impact on highway safety or the severe residual cumulative impacts on the road network.

x) Waste Management

- 10.54. The Council has published a Waste Management Planning Advice Note. It sets out that all new developments of one or more dwellings shall be designed to accommodate refuse and recycling bins and containers in a way that readily facilitates the collections without the storage facilities causing harm to visual amenity or the amenity of residents (both neighbouring residents and future occupiers of the development). The Advice Note also sets out a requirement for waste storage.
- 10.55. Based on the submitted plan, it shows that a bins storage area is provided. Further details of the bins storage should be provided to support this application. However, it is considered that such details can be secured by a planning condition if planning permission were to be forthcoming.

xi) Ecology and Biodiversity

- 10.56. Policy NR2 of the Borough Local Plan 2013-2033 sets out that development proposals shall be accompanied by ecological reports in accordance with BS42020 to aid the assessment of the proposal. The application site is approximately 0.1 kilometres from the Southwest London Waterbodies Special Protection Area (SPA) and the Wraysbury & Hythe End Gravel Pits Site of Special Scientific Interest (SSSI). The site is approximately 0.5 kilometres from the Wraysbury No.1 Gravel Pit SSSI. The site is also in close proximity to other non-statutory designated sites, including Wraysbury II Gravel Pits Local Wildlife Site (LWS), Wraysbury I Gravel Pit LWS, Colne Brook LWS and Horton and Kingsmead Lake LWS.
- 10.57. This application is accompanied by a preliminary roost assessment report, which is prepared by BiOME Consulting Limited on behalf of the application. Paragraph 4.2.1 of the report sets out that further survey work will be required to evaluate if/where bats are roosting in 1&3 Station Road, No. 61 The Green and the wooden shed to be impacted by the proposed works and to identify which bat species are present.

10.58. The outcome of an ecological survey is a material consideration of a planning application. Given that insufficient information has been provided in this application to determine the likely impact of the proposals upon protected species, the proposed development is contrary to Policy NR2 of the Borough Local Plan 2013-2033 and Neighbourhood Planning Policy NP/OE2 of the Horton and Wraysbury Neighbourhood Plan 2018-2033.

xii) Environmental Health

10.59. Policy EP1 of the Borough Local Plan 2013-2033 sets out that new development will only be supported where it would not have an unacceptable effect on environmental quality both during the construction phase or when completed. Details of remedial or preventative measures and any supporting environmental assessments will be required and will be secured by planning conditions to ensure that the development will be acceptable. Policy EP5 of the Borough Local Plan 2013-2033 also sets out that development proposals will be supported where they can demonstrate that adequate and effective remedial measures to remove the potential harm to human health and the environment are successfully mitigated.

10.60. No. 59 The Green was used as a car repair and garage so there is a possible presence of underground tanks. Environmental Protection Officer has been consulted in this application and considers that further details should be provided to identify potential contaminative use of the site and assess the risk. Such details can be secured by a planning condition if planning permission were to be forthcoming.

xiii) Other Material Considerations

10.61. The proposed development is introducing 12 market residential units to the site (an increase of 8 compared to the existing site). Following the formal adoption of the Borough Local Plan 2013-2033, the Council can now demonstrate an up-to-date supply of land for housing and therefore not reliant on sites that are not policy compliant to bring forward adequate housing in the district.

11. COMMUNITY INFRASTRUCTURE LEVY (CIL)

11.1. The development is CIL liable. The proposed floorspace of the dwellings is £295.11 per sqm (indexation rate 2022).

12. PLANNING BALANCE AND CONCLUSION

12.1. The proposed development is seeking to introduce 3 new office units to the site, including a change of use of the ground floor from takeaway to office in No. 57 The Green and a change of use of the ground floor from car repair garage to two office units in No. 59 The Green. It is considered that the retail units including the car repairs garage have been vacant already for a certain period of time, based on the planning history of the site and officers' site visit. Furthermore, the retail units could be converted to offices without express planning permission. There are significant other local services in the local centre and as such, the overall function of the centre and opportunities for customer choice are maintained. There is also no evidence showing that Wraysbury Local Centre has a considerable proportion of vacant property. Therefore, it is not considered that the proposed development will adversely affect the function of Wraysbury Local Centre in this case.

12.2. The application site is within Flood Zone 2 and 3 and the proposed development is classified as a "more-vulnerable" use, as defined by the NPPF. The submitted flood risk assessment fails to assess the flood risk to and from a development site. The proposed development also fails to pass the sequential test in this case.

12.3. The increased height of the corner building is not acceptable. The layout of the site will be dominated by the hard-surfacing parking area and very limited landscaping opportunities within the site, and would fail to respect the character of the area. The proposal also fails to respond to the corner characteristic of the site. The proposed development will introduce a number of side windows in Plot 12 which would result in overlooking the neighbouring properties. Furthermore,

a number of windows in the proposed development are poorly designed and they fail to provide a good quality outlook of the external environment from habitable rooms. The proposed development is not seeking to provide any private and communal amenity spaces for future occupants. It is considered that the proposed development fails to provide sufficient level of high quality private and public amenity spaces for future occupants.

- 12.4. The proposed development comprises an increased height of the corner building, which is immediately opposite the Grade II listed The Perseverance Public House. No heritage statement is provided to assess the impacts on the setting of the Grade II listed building. The increase in the height of the building would be harmful to the setting of the listed building. It represents less than substantial harm to the significance of the designated heritage asset. No public benefit has been identified that would outweigh this harm.
- 12.5. The proposed development includes the provision of twelve residential units, of which the majority of the units would be one-bedroom. The proposed housing size mix fails to provide an appropriate mix of dwelling types and sizes to meet the needs of current and projected households in the local area.
- 12.6. The proposed development is not seeking to provide any onsite affordable housing units and contribution towards affordable housing. The Royal Borough is able to demonstrate an up-to-date supply of land for housing and is therefore not reliant on sites that are not policy compliant to bring forward adequate housing in the Borough. The proposed development is not considered to secure sufficient public benefit development to outweigh these material concerns with the under-provision of affordable housing on the site.
- 12.7. The outcome of the bat survey is a material consideration to the proposal. As the current application does not comprise the bat survey, there is insufficient information to demonstrate that the proposal would not have an adverse ecological impact on the natural habitats.
- 12.8. The Royal Borough of Windsor and Maidenhead declared a climate emergency in June 2019, and the Council intends to implement a national policy to ensure net-zero carbon emissions can be achieved by no later than 2050. Policy SP2 of the Borough Local Plan 2013-2033 requires all development to demonstrate how they have been designed to incorporate measures to adapt to and mitigate climate change. No information including an energy statement, however, has been provided in this application.
- 12.9. To conclude, the proposed development would provide 12 residential units. However, the weight attributed to the provision of housing and economic benefits would not either individually or cumulatively, be sufficient to outweigh the other harms that are set out above. On this basis of the foregoing, it is therefore recommended that planning permission be refused.

13. APPENDICES TO THIS REPORT

- Appendix A - Site location plan and site layout
- Appendix B – plan and elevation drawings

14. REASONS RECOMMENDED FOR REFUSAL IF PERMISSION IS NOT GRANTED

- 1 The proposed roof extension to 1-3 The Green, by virtue of its height, bulk and design, would not respect the scale and form of the neighbouring buildings and would appear prominent in the street scene. Furthermore, the quantum of built form and hard-surfacing within the would leave very limited space for meaningful landscaping which is at odds with the character of the area. It is therefore considered that the proposed development fails to comply with Section 12 of the National Planning Policy Framework 2021 and Policy QP3 of the Borough Local Plan 2013-2033, Policies NP/HOU1 and NP/HOU2 of the Horton and Wraysbury Neighbourhood Plan 2018-2033.
- 2 A number of windows in the proposed development are poorly designed. The proposed development fails to provide a good quality outlook of the external environment from habitable rooms and would result in overlooking the neighbouring properties. There is also insufficient amenity space for future occupants of the proposed development. As such, the proposed

development is contrary to Policy QP3 of the Borough Local Plan 2013-2033 and the Borough Wide Design Guide.

- 3 The proposed development comprises an increased height of the corner building, 1-3 The Green, which is immediately opposite the Grade II listed The Perseverance Public House. No heritage statement is provided to assess the impacts on the setting of the Grade II listed building. The increase in the height of the building would be harmful to the setting of the listed building and would represent less than substantial harm to the significance of the designated heritage asset. The public benefits associated with the proposal would not outweigh this identified harm, and as such, the proposal is considered to be contrary to Sections 12 and 16 of the NPPF and Policies QP3 and HE1 of the Borough Local Plan 2013-2033.
- 4 The proposed development includes the provision of twelve residential units, of which the majority of the units would be one-bedroom. The proposed housing size mix of this proposed development is not in accordance with the Strategic Housing Market Assessment 2016 suggested housing size mix. In an absence of other evidence of local circumstances or market conditions, it is not considered that the proposed housing mix of the proposal is acceptable as it would fail to provide an appropriate mix of dwelling types and sizes to meet the needs of current and projected households of the local area. The proposal is contrary to Policy HO2 of the Borough Local Plan 2013-2033.
- 5 The proposed development includes the provision of twelve residential units, which would trigger the affordable housing requirement within the development plan. The proposed development is not seeking to provide any on-site affordable housing or provide a contribution towards affordable housing. No information or viability evidence has been provided in this application. The proposed development, therefore, fails to comply with Policy HO3 of the Borough Local Plan 2013-2033.
- 6 The proposed development is within Flood Zone 2 and 3. In an absence of an acceptable flood risk assessment, the proposed development fails to assess the flood risk to and from a development site. The proposal development also fails to pass the sequential test. Therefore, the proposed development fails to comply with Section 14 of the National Planning Policy Framework and Policy NR1 of the Borough Local Plan 2013-2033.
- 7 The outcome of the bat survey is a material consideration for the proposal. As the current application does not comprise the bat survey as a recommendation by the submitted preliminary roost assessment report, there is insufficient information to demonstrate that the proposal would not have an adverse ecological impact on the natural habitats. The proposal, therefore, fails to comply with Section 15 of the National Planning Policy Framework and Policy NR2 of the Borough Local Plan (2013-2033).
- 8 The applicant has failed to submit information to demonstrate how the proposed development would work towards minimising CO2 emissions or how it has been designed to incorporate measures to adapt to and mitigate climate change. As such, the proposal is considered to be contrary to Policy SP2 of the Borough Local Plan, Chapter 14 of the NPPF (2021) and the Council's Interim Sustainability Position Statement.

22/00217/FULL - Land At 57 To 61 The Green Wraysbury And 1 To 3 Station Road Wraysbury Staines

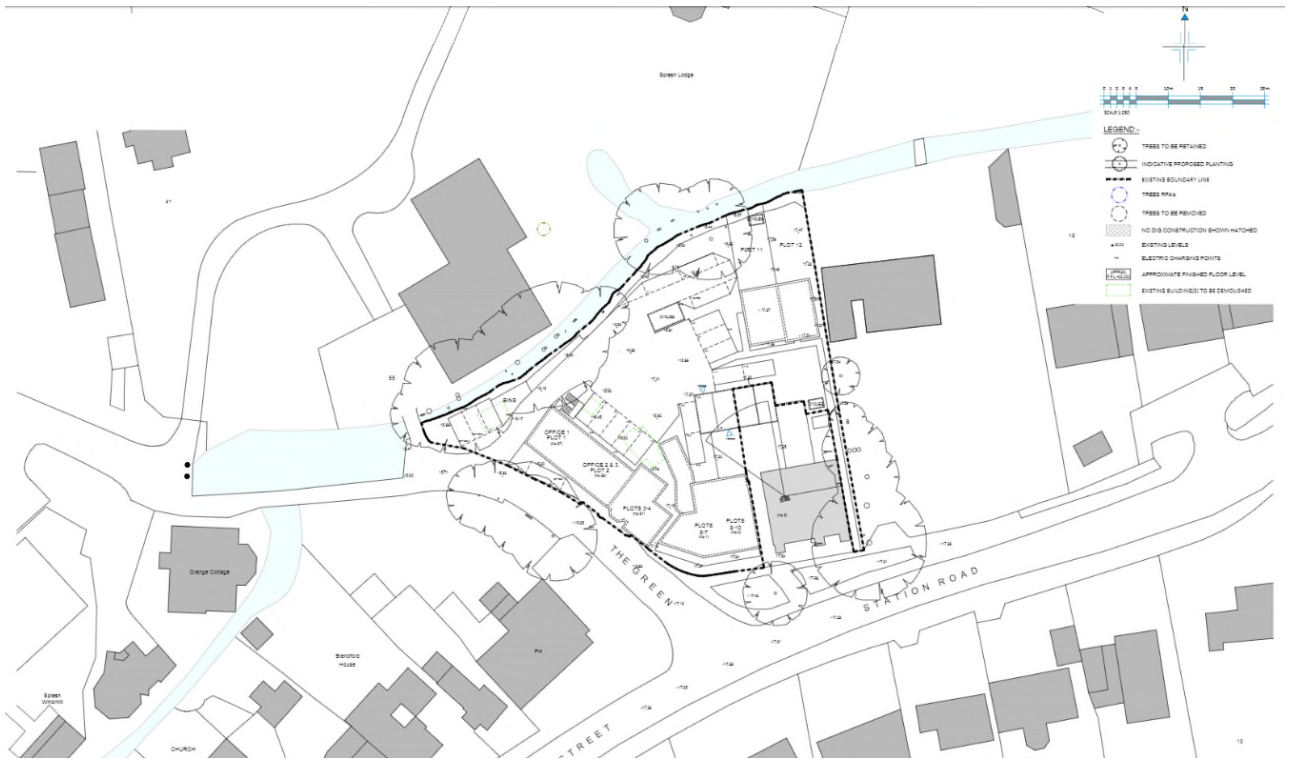
Appendices

Appendix A - Site Location Plan and Site Layout

Site Location Plan



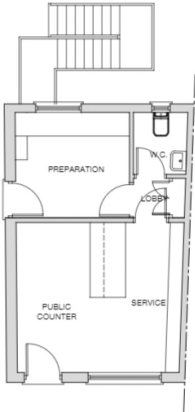
Site Plan



Appendix B – Plan and Elevation Drawings

No. 57 The Green (Plot 1)

Existing Floor Plans



GROUND FLOOR PLAN



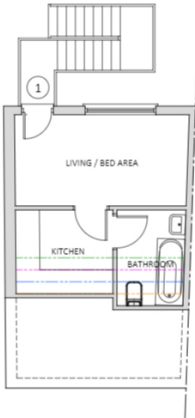
FIRST FLOOR PLAN

2400mm ABOVE FFL
 2100mm ABOVE FFL
 1800mm ABOVE FFL
 1500mm ABOVE FFL

Proposed Floor Plans



GROUND FLOOR PLAN

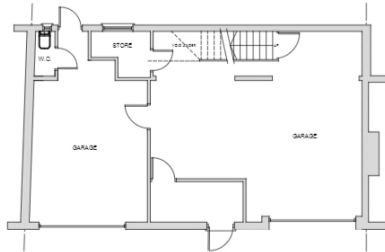


FIRST FLOOR PLAN

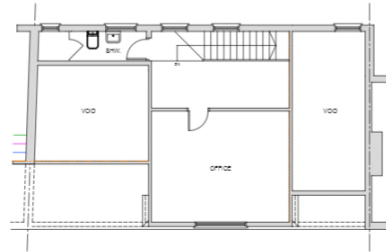
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No. 59 The Green (Plot 2)

Existing Floor Plans

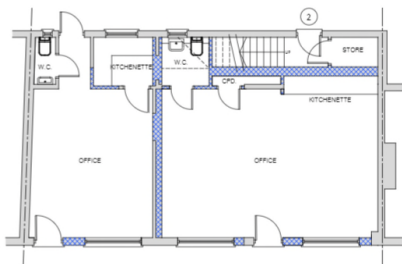


GROUND FLOOR PLAN

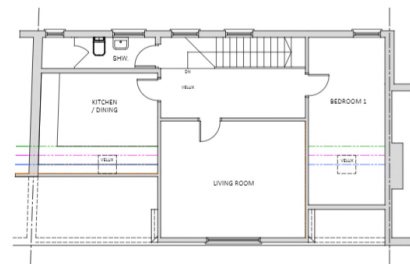


FIRST FLOOR PLAN

Proposed Floor Plans



GROUND FLOOR PLAN

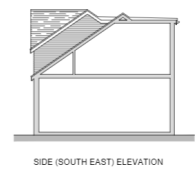


FIRST FLOOR PLAN

Existing Elevations

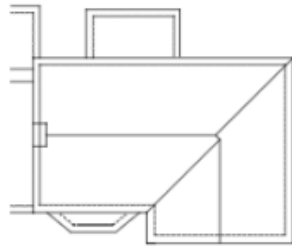


Proposed Elevations

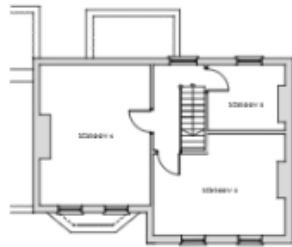


No. 61 The Green (Plot 3 and 4)

Existing Floor Plans



ROOF PLAN

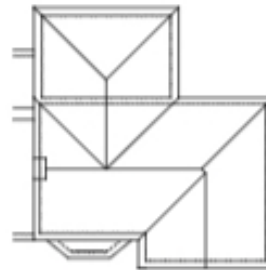


FIRST FLOOR PLAN



GROUND FLOOR PLAN

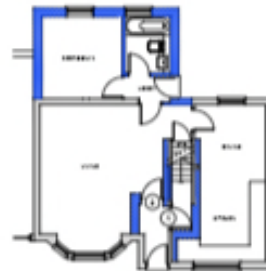
Proposed Floor Plans



ROOF PLAN



FIRST FLOOR PLAN

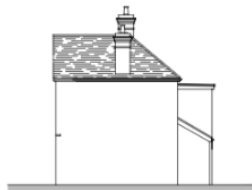


GROUND FLOOR PLAN

Existing Elevations



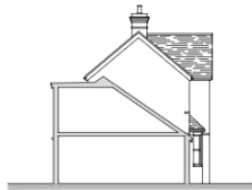
FRONT (SOUTH WEST) ELEVATION



SIDE (SOUTH EAST) ELEVATION



REAR (NORTH EAST) ELEVATION

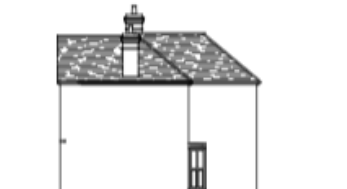


SIDE (NORTH WEST) ELEVATION

Proposed Elevations



FRONT (SOUTH WEST) ELEVATION



SIDE (SOUTH EAST) ELEVATION



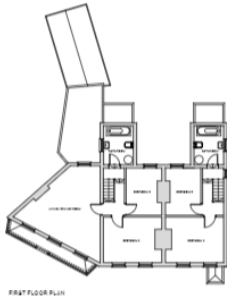
REAR (NORTH EAST) ELEVATION



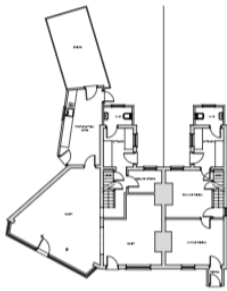
SIDE (NORTH WEST) ELEVATION

No 1 to 3 Station Road (Plot 5 to 10)

Existing Floor Plans

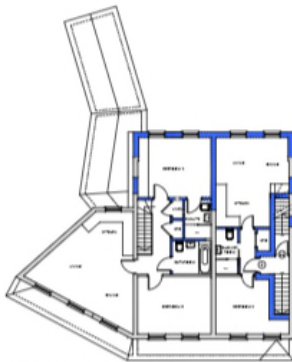


FIRST FLOOR PLAN

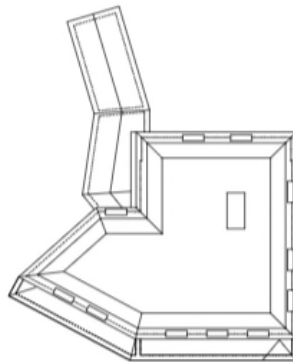


GROUND FLOOR PLAN

Proposed Floor Plans



FIRST FLOOR PLAN



ROOFSCAPE PLAN



GROUND FLOOR PLAN

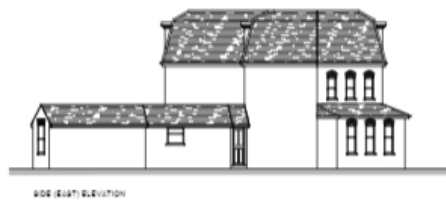
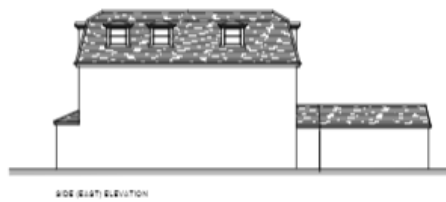


SECOND FLOOR PLAN

Existing Elevations

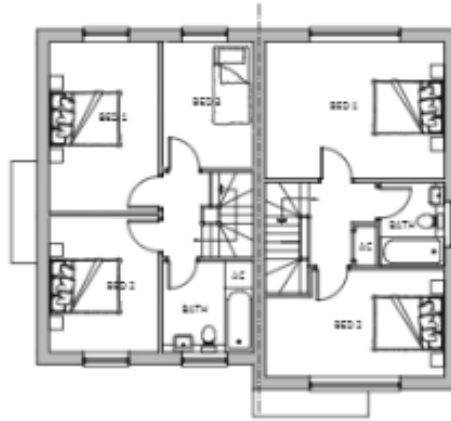


Proposed Elevations



Rear of No 5 to 7 Station Road (Plot 11 to 12)

Proposed Floor Plan



FIRST FLOOR



PLOT 11 PLOT 12

GROUND FLOOR

Proposed Elevations



SIDE NO 11
ELEVATIONS

FRONT NO 12



FRONT NO 11
ELEVATION



REAR NO 12
ELEVATIONS

SIDE NO 11



SIDE NO 12
ELEVATION